

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

EUNICE LOCKETT,	)	
	)	
Plaintiff,	)	FILED STAMP: JULY 30, 2008
	)	08CV4329
vs.	)	JUDGE CASTILLO
	)	MAG. JUDGE COLE
CERTEGY CHECK SERVICES, INC.,	)	J. N.
	)	
Defendant.	)	

**COMPLAINT**

**INTRODUCTION**

1. Plaintiff brings this action against Certegy Check Services, Inc. to secure redress for improper information on her credit report, in violation of the Fair Credit Reporting Act, 15 U.S.C. §1681 et seq.

**JURISDICTION AND VENUE**

2. This Court has jurisdiction under 28 U.S.C. §§ 1331 and 1337 and 15 U.S.C. §1681p . Venue in this District is proper because defendant does business in this District.

**PARTIES**

3. Plaintiff is an individual who resides in the Northern District of Illinois.

4. Defendant Certegy Check Services, Inc. is a corporation with offices at  
11601

Roosevelt Blvd., St. Petersburg, FL 33716.

5. Defendant Certegy Check Services, Inc. is a consumer reporting agency subject to the Fair Credit Reporting Act, and has been judicially determined to be such. Lofton-

Taylor v. Verizon Wireless, 05-0532-CG-B, 2006 U.S. Dist. LEXIS 83684 (S.D.Ala., Nov. 14, 2006), *aff'd*, 262 Fed. Appx. 999, 2008 U.S. App. LEXIS 1596 (11th Cir., Jan. 23, 2008).

**FACTS**

6. Plaintiff is the victim of deceptive telemarketing practices.

7. The telemarketer obtained plaintiff's checking account information and created "electronic checks" which it presented against plaintiff's account to remove funds from the account.

8. Plaintiff instructed her bank not to honor any such "electronic checks."

9. The telemarketer transferred one or more "electronic checks" to Certegy Check Services, Inc.

10. Certegy Check Services, Inc., had its affiliate, Certegy Payment Recovery Services, Inc., attempt to collect the "electronic checks" plus service charges thereon. Certegy Payment Recovery Services, Inc. is located at the same address as Certegy Check Services, Inc.

11. On information and belief, Certegy Check Services, Inc. has access to all information which Certegy Payment Recovery Services, Inc., has concerning a particular individual, and vice versa.

12. On or about April 27, 2008, Certegy Payment Recovery Services, Inc. sent plaintiff Exhibit A.

13. Exhibit A adds a \$25 "returned check service charge" to the amount of the "electronic check."

14. Illinois law, 810 ILCS 5/3-806, authorizes a \$25 fee under limited circumstances:

Sec. 3-806. Any person who issues a check or other draft that is not honored upon presentment because the drawer does not have an account with the drawee, or because the drawer does not have sufficient funds in his account, or because the drawer does not have sufficient credit with the drawee, shall be liable in the amount of \$ 25, or for all costs and expenses, including reasonable attorney's fees, incurred by any person in connection with the collection of the amount for which the check or other draft was written, whichever is greater, and shall be liable for interest upon the amount of the check or other draft at the rate provided in subsection (1) of Section 4 of the Interest Act [815 ILCS 205/4]. Costs and expenses shall include reasonable costs and expenses incurred in the nonlitigated collection of the check or other draft.

A person who undertakes a nonlitigated collection against the person who issued a check or other draft that is not honored upon presentment shall make a written demand by certified mail, return receipt requested, delivered to the last known address of that person in order to become eligible for any costs and expenses in excess of \$ 25. The written demand shall demand payment within 30 days of the mailing of the demand and shall include notice of liability for the costs and expenses.

A fee or charge not to exceed \$ 4.50 may be assessed to any person or owner of a commercial checking account or other similar commercial account where a check or other draft that is deposited into the account is dishonored upon presentment because of insufficient funds or because the drawer does not have an account with the drawee; provided, however, that, the limitation on the fee or charge specified in this paragraph does not apply to any fee or charge assessed to any bank or other depository institution or to any non-commercial checking account or other similar non-commercial account.

15. The \$25 fee (a) does not apply to a “stop payment” situation and (b) does not apply to “electronic checks” created by a telemarketer rather than actually issued by the consumer.

16. On May 27, 2008, plaintiff informed Certegy Payment Recovery Services, Inc. that no check had been dishonored as the result of a dispute (Exhibit B).

17. On May 29, 2008, plaintiff requested that Certegy Check Services, Inc. provide a copy of the information it was maintaining regarding plaintiff (Exhibit C).

18. On July 8, 2008, plaintiff again requested that Certegy Check Services, Inc. provide a copy of the information it was maintaining regarding plaintiff. (Exhibit D)

19. On June 14, 2008, Certegy Payment Recovery Services, Inc., acting on behalf

of Certegy Check Services, Inc., sent plaintiff the letter attached as Exhibit E.

20. On June 28, 2008, Certegy Payment Recovery Services, Inc., acting on behalf

of Certegy Check Services, Inc., sent plaintiff the letter attached as Exhibit F.

21. On July 12, 2008, Certegy Payment Recovery Services, Inc., acting on behalf of Certegy Check Services, Inc., sent plaintiff the letter attached as Exhibit G.

22. On information and belief, based on the above events, plaintiff believes that Certegy Check Services, Inc. is maintaining information regarding plaintiff that it knows or should know is false.

23. On information and belief, based on difficulties that plaintiff has encountered in writing checks, plaintiff believes that Certegy Check Services, Inc. has disseminated to users of its consumer reports information regarding plaintiff that it knows or should know is (a) false and (b) disputed, without noting the existence of any dispute.

**COUNT I – FAIR CREDIT REPORTING ACT**

24. Plaintiff incorporates ¶¶ 1-23.

25. Under the Fair Credit Reporting Act, 15 U.S.C. §1681g, Certegy Check Services, Inc. “shall, upon request . . . clearly and accurately disclose to the consumer: (1) All information in the consumer's file at the time of the request . . . .”

26. Defendant Certegy Check Services, Inc. has negligently or wilfully failed to comply, in violation of 15 U.S.C. §1681n and/or §1681o.

WHEREFORE, plaintiff requests that the Court enter judgment in her favor and against Certegy Check Services, Inc. for:

- a. Appropriate actual, punitive and statutory damages;
- b. Attorney's fees, litigation expenses and costs of suit;
- c. Such other or further relief as the Court deems proper.

**COUNT II – FAIR CREDIT REPORTING ACT**

27. Plaintiff incorporates ¶¶ 1-23.

28. Under the Fair Credit Reporting Act, 15 U.S.C. §1681e, Certegy Check Services, Inc. is required to “follow reasonable procedures to assure maximum possible accuracy of the information concerning the individual about whom the report relates.”

29. Defendant Certegy Check Services, Inc. has negligently or wilfully failed to comply, in violation of 15 U.S.C. §1681n and/or §1681o.

WHEREFORE, plaintiff requests that the Court enter judgment in her favor and against Certegy Check Services, Inc. for:

- a. Appropriate actual, punitive and statutory damages;
- b. Attorney's fees, litigation expenses and costs of suit;
- c. Such other or further relief as the Court deems proper.

s/ Daniel A. Edelman  
Daniel A. Edelman

Daniel A. Edelman  
Cathleen M. Combs  
James O. Lattuner  
Tara L. Goodwin

Rupali R. Shah  
EDELMAN, COMBS, LATTURNER  
& GOODWIN, LLC  
120 S. LaSalle Street, 18th Floor  
Chicago, Illinois 60603  
(312) 739-4200  
(312) 419-0379 (FAX)

**JURY DEMAND**

Plaintiff demands trial by jury.

s/ Daniel A. Edelman \_\_\_\_\_  
Daniel A. Edelman

**NOTICE OF LIEN AND ASSIGNMENT**

Please be advised that we claim a lien upon any recovery herein for 1/3 or such amount as a court awards. All rights relating to attorney's fees have been assigned to counsel.

s/ Daniel A. Edelman  
Daniel A. Edelman

Daniel A. Edelman  
EDELMAN, COMBS, LATTURNER  
& GOODWIN, LLC  
120 S. LaSalle Street, 18th Floor  
Chicago, Illinois 60603  
(312) 739-4200  
(312) 419-0379 (FAX)

T:\21437\Pleading\Complaint-DAE\_Pleading.wpd

08CV4329

JUDGE CASTILLO

MAG. JUDGE COLE

J. N.

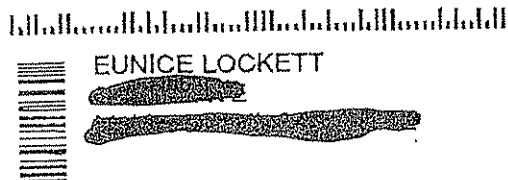
**EXHIBIT A**

PO BOX 30031  
Tampa, FL 33630-3031  
LOCKETT

Certegy Payment Recovery Services, Inc.  
11601 Roosevelt Boulevard  
St. Petersburg, Florida 33716  
Office Hours: 8:00 AM to 11:00 PM EST Monday - Thursday  
8:00 AM to 2:00 PM EST Friday  
8:00 AM to 2:00 PM EST Saturday  
(866) 838-6092

# REDEPOSIT NOTIFICATION FIRST NOTICE

DATE: 04/27/08  
MERCHANT: SMC CONT MEMBER (PERSONAL)  
CLAIM NUMBER: 25553992  
CHECK NUMBER: 000421  
CHECK DATE: 04/21/08  
CHECK AMOUNT: \$79.90  
RETURNED CHECK SERVICE CHARGE: \$25.00  
**TOTAL DUE: \$104.90**



This letter is to notify you that the attempted electronic funds transfer of \$79.90 payable to SMC CONT MEMBER (PERSONAL) was returned unpaid. This transfer was initiated on April 21, 2008 using check #000421 ("Electronic Check"). This Electronic Check has been referred to Certegy Payment Recovery Services, Inc. ("CPRS") for collection. All further communication regarding this Electronic Check should be with CPRS.

Certegy Check Services, Inc. has paid SMC CONT MEMBER (PERSONAL) for your unpaid Electronic Check. Certegy Check Services, Inc. is now the owner of your Electronic Check and is our client. We are representing your Electronic Check to our financial institution. Please check with your financial institution to determine if your Electronic Check has been debited from your account. If your Electronic Check has been debited from your account, or will be debited upon presentment, CPRS will collect the service charge of \$25.00 through an electronic debit for your convenience. If your Electronic Check will not be honored upon presentment, you will need to send us payment for the Total Amount Due below of \$104.90. To insure proper recording of your payment, return the bottom portion of this letter and write the claim number on your payment.

Information regarding your dishonored Electronic Check has been recorded by our client in their national check database, which is used by retail stores and financial institutions across North America. If your Electronic Check remains unpaid your ability to write a check or open a new bank account may be negatively affected. Our client may also request that the unpaid check information appear in your personal credit file.

Federal law gives you thirty (30) days after you receive this letter to dispute the validity of the debt or any part of it. If you don't dispute it within that period, we will assume that it is valid. If you do dispute it by notifying us in writing to that effect, we will, as required by law, obtain and mail to you proof of the debt. And if within the same period, you request in writing the name and address of your original creditor, we will furnish you with that information, too. The law does not require us to wait until the end of the 30-day period before making further efforts to collect this debt. If, however, you request proof of the debt or the name and address of the original creditor within the 30-day period that begins with your receipt of this letter, the law requires us to suspend our efforts to collect the debt until we mail the requested information to you.

We are a collection agency. This is an attempt to collect a debt and any information obtained will be used for that purpose.

To receive proper credit on your account return this portion with your payment in the enclosed envelope.

EUNICE LOCKETT

DATE: 04/27/08  
MERCHANT: SMC CONT MEMBER (PERSONAL)  
CLAIM NUMBER: 25553992  
CHECK NUMBER: 000421  
CHECK DATE: 04/21/08  
CHECK AMOUNT: \$79.90  
RETURNED CHECK SERVICE CHARGE: \$25.00  
**TOTAL DUE: \$104.90**

Claims Accounting  
PO Box 30272  
Tampa FL 33630-3272

Make Money Order or Cashiers Check  
Payable to:  
Certegy Payment Recovery Services, Inc.

A1PE0802

25553992 0007990 2500 LOCKETT

EXHIBIT B

\*\*\*\*\* -COMM. JOURNAL- \*\*\*\*\* DATE MAY-27-2008 \*\*\*\*\* TIME 07:43 \*\*\*\*\*

MODE = MEMORY TRANSMISSION

START=MAY-27 07:42

END=MAY-27 07:43

FILE NO.=209

STN NO.	COMM.	ONE-TOUCH/ ABBR NO.	STATION NAME/TEL NO.	PAGES	DURATION
001	DK	2	8999#17275704914#	001/001	00:00:21

-ECLG LLC

\*\*\*\*\* -ECLG LLC - \*\*\*\*\* 3124190379- \*\*\*\*\*

**EDELMAN, COMBS, LATTURNER & GOODWIN, L.L.C.**

120 S. LaSalle Street, 18th floor

Chicago, Illinois 60603-3403

(312) 739-4200

(800) 644-4673

(312) 419-0379 (FAX)

Email: [info@edcombs.com](mailto:info@edcombs.com)[www.edcombs.com](http://www.edcombs.com)

May 27, 2008

Fax to 727-570-4914

Certegy Payment Recovery Services

11601 Roosevelt Blvd.

St. Petersburg, FL 33716

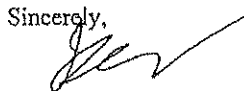
Re: Eunice Lockett 25553992

Ladies/ Gentlemen:

Please be advised that we represent the above individual and that our client disputes the claimed debt(s) described above. No check has been dishonored. Our client revoked SMC's authorization to debit funds for good cause. You are hereby advised that our client refuses to pay.

Thank you.

Sincerely,



Daniel A. Edelman

**EDELMAN, COMBS, LATTURNER & GOODWIN, L.L.C.**

120 S. LaSalle Street, 18th floor

Chicago, Illinois 60603-3403

(312) 739-4200

(800) 644-4673

(312) 419-0379 (FAX)

Email: [info@edcombs.com](mailto:info@edcombs.com)

[www.edcombs.com](http://www.edcombs.com)

May 27, 2008

Fax to 727-570-4914

Certegy Payment Recovery Services  
11601 Roosevelt Blvd.  
St. Petersburg, FL 33716

Re: Eunice Lockett 25553992

Ladies/ Gentlemen:

Please be advised that we represent the above individual and that our client disputes the claimed debt(s) described above. No check has been dishonored. Our client revoked SMC's authorization to debit funds for good cause. You are hereby advised that our client refuses to pay.

Thank you.

Sincerely,



Daniel A. Edelman

EXHIBIT C

MODE = MEMORY TRANSMISSION

START=MAY-29 10:38

END=MAY-29 10:39

FILE NO.=085

STN NO.	COMM.	ONE-TOUCH/ ABBR NO.	STATION NAME/TEL NO.
001	OK	2	21437#17275704914#

PAGES	DURATION
002/002	00:00:24

-ECLG LLC

\*\*\*\*\* -ECLG LLC

- \*\*\*\*\* -

3124190379- \*\*\*\*\*

**EDELMAN, COMBS, LATTURNER & GOODWIN, L.L.C.**

120 S. LaSalle Street, 18th floor

Chicago, Illinois 60603-3403

(312) 739-4200

(800) 644-4673

(312) 419-0379 (FAX)

Email: [info@edcombs.com](mailto:info@edcombs.com)

[www.edcombs.com](http://www.edcombs.com)

May 29, 2008

Fax to 727-570-4914 AND MAIL

Certegy Check Services  
11601 Roosevelt Blvd.  
St. Petersburg, FL 33716

Re: Eunice Lockett 25553992

Ladies/ Gentlemen:

Please provide a copy of all credit information you are maintaining on our client. Her authorization is enclosed.

Thank you.

Sincerely,



Daniel A. Edelman

EDELMAN, COMBS, LATTURNER & GOODWIN, L.L.C.

120 S. LaSalle Street, 18th floor

Chicago, Illinois 60603-3403

(312) 739-4200

(800) 644-4673

(312) 419-0379 (FAX)

Email: [info@edcombs.com](mailto:info@edcombs.com)

[www.edcombs.com](http://www.edcombs.com)

May 29, 2008

Fax to 727-570-4914 AND MAIL

Certegy Check Services

11601 Roosevelt Blvd.

St. Petersburg, FL 33716

Re: Eunice Lockett 25553992

Ladies/ Gentlemen:

Please provide a copy of all credit information you are maintaining on our client. Her authorization is enclosed.

Thank you.

Sincerely,



Daniel A. Edelman

EDELMAN, COMBS, LATTURNER & GOODWIN, LLC

120 S. LaSalle Street, 18th floor

Chicago, Illinois 60603-3403

(312) 739-4200

(800) 644-4673

(312) 419-0379 (FAX)

Email: [edcombs@aol.com](mailto:edcombs@aol.com)

[www.edcombs.com](http://www.edcombs.com)

AUTHORIZATION

Eunice Lockett hereby authorizes Edelman, Combs, Latturner & Goodwin, LLC to obtain credit reports and information for the purpose of attempting to correct or remove erroneous information from them.

Eunice Lockett

REDACTED

\_\_\_\_\_  
Social Security Number

**EXHIBIT D**

B

MODE = MEMORY TRANSMISSION

START=JUL-08 09:03

END=JUL-08 09:04

FILE NO.=118

STN NO.	COMM.	ONE-TOUCH/ ABBR NO.	STATION NAME/TEL NO.	PAGES	DURATION
001	OK		21437H17275704914H	001/001	00:00:16

-ECLG LLC

\*\*\*\*\* -ECLG LLC - \*\*\*\*\* 3124190379- \*\*\*\*\*

**EDELMAN, COMBS, LATTURNER & GOODWIN, L.L.C.**

120 S. LaSalle Street, 18th floor

Chicago, Illinois 60603-3403

(312) 739-4200

(800) 644-4673

(312) 419-0379 (FAX)

Email: [info@edcombs.com](mailto:info@edcombs.com)

[www.edcombs.com](http://www.edcombs.com)

July 8, 2008

Fax to 727-570-4914 AND MAIL

Certegy Check Services  
11601 Roosevelt Blvd.  
St. Petersburg, FL 33716

Re: Eunice Lockett 25553992

Ladies/ Gentlemen:

We have not had any response to our May 29, 2008 request for a copy of all credit information you are maintaining on our client. Are you refusing to comply with this request?

Sincerely,



Daniel A. Edelman

**EDELMAN, COMBS, LATTURNER & GOODWIN, L.L.C.**

120 S. LaSalle Street, 18th floor

Chicago, Illinois 60603-3403

(312) 739-4200

(800) 644-4673

(312) 419-0379 (FAX)

Email: [info@edcombs.com](mailto:info@edcombs.com)

[www.edcombs.com](http://www.edcombs.com)

July 8, 2008

**Fax to 727-570-4914 AND MAIL**

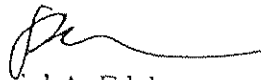
Certegy Check Services  
11601 Roosevelt Blvd.  
St. Petersburg, FL 33716

Re: Eunice Lockett 25553992

Ladies/ Gentlemen:

We have not had any response to our May 29, 2008 request for a copy of all credit information you are maintaining on our client. Are you refusing to comply with this request?

Sincerely,



Daniel A. Edelman

EXHIBIT E

PO BOX 30031  
Tampa, FL 33630-3031

LOCKETT

Certegy Payment Recovery Services, Inc.  
11601 Roosevelt Boulevard  
St. Petersburg, Florida 33716  
Office Hours: 8:00 AM to 11:00 PM EST Monday -Thursday  
8:00 AM to 2:00 PM EST Friday  
8:00 AM to 2:00 PM EST Saturday  
(866) 838-6092

## SECOND NOTICE



EUNICE LOCKETT

47

DATE: 06/14/08  
MERCHANT: SMC CONT MEMBER (PERSONAL)  
CLAIM NUMBER: 25553992  
CHECK NUMBER: 000421  
CHECK DATE: 04/21/08  
CHECK AMOUNT: \$79.90  
RETURNED CHECK SERVICE CHARGE: \$25.00  
**TOTAL DUE: \$104.90**

Your Electronic Check #000421 payable to SMC CONT MEMBER (PERSONAL) on April 21, 2008 for \$79.90 remains unpaid despite our previous attempt to resolve this with you. Your unpaid Electronic Check has been referred to Certegy Payment Recovery Services, Inc. ("CPRS") for collection. All further communication regarding your Electronic Check should be with CPRS. Failure to pay will result in further collection efforts.

Certegy Check Services, Inc. has paid SMC CONT MEMBER (PERSONAL) for your unpaid Electronic Check. Certegy Check Services, Inc. is the owner of your Electronic Check and is our client. You will need to send us payment for the Total Amount Due below of \$104.90.

Information regarding your dishonored Electronic Check has been recorded by our client in their national check database, which is used by retail stores and financial institutions across North America. If your Electronic Check remains unpaid, your ability to write a check or open a new bank account may be negatively affected. Our client may also request that the unpaid Electronic Check information appear in your personal credit file.

We are a collection agency. This is an attempt to collect a debt and any information obtained will be used for that purpose.

To receive proper credit on your account return this portion with your payment in the enclosed envelope.

EUNICE LOCKETT

Claims Accounting  
PO Box 30272  
Tampa FL 33630-3272

DATE: 06/14/08  
MERCHANT: SMC CONT MEMBER (PERSONAL)  
CLAIM NUMBER: 25553992  
CHECK NUMBER: 000421  
CHECK DATE: 04/21/08  
CHECK AMOUNT: \$79.90  
RETURNED CHECK SERVICE CHARGE: \$25.00  
**TOTAL DUE: \$104.90**

Make Money Order or Cashiers Check  
Payable to:  
Certegy Payment Recovery Services, Inc.  
or Call: (866) 838-6092  
To Pay By Phone

CPE0802

25553992 0007990 2500 LOCKETT

EXHIBIT F

PO BOX 30031  
Tampa, FL 33630-3031  
[REDACTED]  
LOCKETT

Certegy Payment Recovery Services, Inc.  
11601 Roosevelt Boulevard  
St. Petersburg, Florida 33716  
Office Hours: 8:00 AM to 11:00 PM EST Monday -Thursday  
8:00 AM to 10:00 PM EST Friday  
8:00 AM to 6:00 PM EST Saturday  
(866) 838-6092

**THIRD NOTICE**

4226  
[REDACTED]  
EUNICE LOCKETT  
[REDACTED]  
[REDACTED]

DATE: 06/28/08  
MERCHANT: SMC CONT MEMBER (PERSONAL)  
CLAIM NUMBER: 25553992  
CHECK NUMBER: 000421  
CHECK DATE: 04/21/08  
CHECK AMOUNT: \$79.90  
RETURNED CHECK SERVICE CHARGE: \$25.00  
**TOTAL DUE: \$104.90**

You have not responded to any of the previous requests for payment of your Electronic Check #000421 payable to SMC CONT MEMBER (PERSONAL) for \$79.90. Your unpaid Electronic Check has been referred to Certegy Payment Recovery Services, Inc. ("CPRS") for collection. All further communication regarding your Electronic Check should be with CPRS.

Certegy Check Services, Inc. is the owner of your Electronic Check and is our client. We are proceeding with more extensive collection efforts because of your repeated failure to resolve this matter.

Your ability to pay by check or open an account has already been suspended at thousands of stores, banks and businesses nationwide. Our client may also report your unpaid Electronic Check to national credit bureaus Equifax and Innovis, which would list the check as a negative item in your personal credit. To avoid this, you will need to send us payment for the Total Amount Due of \$104.90.

This communication is from a debt collector. This is an attempt to collect a debt and any information obtained will be used for that purpose.

To receive proper credit on your account return this portion with your payment in the enclosed envelope.

EUNICE LOCKETT  
[REDACTED]

[REDACTED]  
Claims Accounting  
PO Box 30272  
Tampa FL 33630-3272

DATE: 06/28/08  
MERCHANT: SMC CONT MEMBER (PERSONAL)  
CLAIM NUMBER: 25553992  
CHECK NUMBER: 000421  
CHECK DATE: 04/21/08  
CHECK AMOUNT: \$79.90  
RETURNED CHECK SERVICE CHARGE: \$25.00  
**TOTAL DUE: \$104.90**

Please remit all payments to:  
Certegy Payment Recovery Services, Inc.  
or Call: (866) 838-6092  
To Pay By Phone

DPE0802

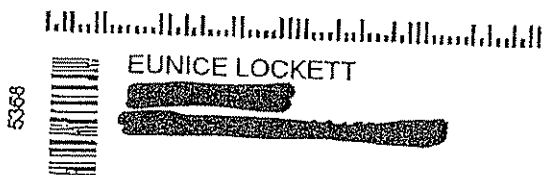
EXHIBIT G

PO BOX 30031  
Tampa, FL 33630-3031

LOCKETT

Certegy Payment Recovery Services, Inc.  
11601 Roosevelt Boulevard  
St. Petersburg, Florida 33716  
Office Hours: 8:00 AM to 11:00 PM EST Monday - Thursday  
8:00 AM to 10:00 PM EST Friday  
8:00 AM to 6:00 PM EST Saturday  
(866) 838-6092

FOURTH NOTICE



DATE: 07/12/08  
MERCHANT: SMC CONT MEMBER (PERSONAL)  
CLAIM NUMBER: 25553992  
CHECK NUMBER: 000421  
CHECK DATE: 04/21/08  
CHECK AMOUNT: \$79.90  
RETURNED CHECK SERVICE CHARGE: \$25.00  
**TOTAL DUE: \$104.90**

Your unpaid Electronic Check #000421 payable to SMC CONT MEMBER (PERSONAL) for \$79.90 has been referred to Certegy Payment Recovery Services, Inc. ("CPRS") for collection. All further communication regarding this Electronic Check should be with CPRS.

Certegy Check Services, Inc. is the owner of your Electronic Check and is our client.

Despite numerous collection attempts via phone calls and letters, we still have not received payment for this returned Electronic Check. Because of this, our client may furnish information regarding this returned Electronic Check to national credit reporting agencies Equifax and Innovis, which would list it as a negative item on your personal credit report.

You are advised that this information may remain in your personal credit file for 7 years. We expect to hear from you within 48 hours to bring this matter to a conclusion.

This communication is from a debt collector. This is an attempt to collect a debt and any information obtained will be used for that purpose.

To receive proper credit on your account return this portion with your payment in the enclosed envelope.

EUNICE LOCKETT  
[Redacted]  
[Redacted]

Claims Accounting  
PO Box 30272  
Tampa FL 33630-3272

DATE: 07/12/08  
MERCHANT: SMC CONT MEMBER (PERSONAL)  
CLAIM NUMBER: 25553992  
CHECK NUMBER: 000421  
CHECK DATE: 04/21/08  
CHECK AMOUNT: \$79.90  
RETURNED CHECK SERVICE CHARGE: \$25.00  
**TOTAL DUE: \$104.90**

Please remit all payments to:  
Certegy Payment Recovery Services, Inc.  
or Call: (866) 838-6092  
To Pay By Phone

EPE0802

25553992

0007990 2500 LOCKETT